

CRAIG BOSTON pro se

V.

Dr. Abby Cassidy,  
PRIMECARE INC.

## COMPLAINT

- 1A. PLAINTIFF, CRAIG BOSTON, IS A RESIDENT OF THE UNITED STATES AND AN INMATE AT BUCKS COUNTY CORRECTIONAL FACILITY (B.C.C.F) 1730 S. EASTON RD. DOYLESTOWN PA 18901
- 2A. Dr. ABBY CASSIDY IS THE HEAD OF MENTAL HEALTH SERVICES AT B.C.C.F. AND EMPLOYED BY PRIMECARE INC.
- 3A. PRIMCARE INC. IS A HEALTH PROVIDER CONTRACTED TO B.C.C.F.
- 4A. PLAINTIFF IS FILING THIS COMPLAINT IN FEDERAL COURT UNDER 1983 (PRISON COMPLAINT) FOR VIOLATIONS OF HIS EIGHT AMENDMENT RIGHTS UNDER THE U.S. CONSTITUTION AND REPRESENTS THE FOLLOWING FACTS

## FACTS

- 1B. ON AUGUST 12, 2016 THE PLAINTIFF WAS DETAINED AT B.C.C.F.
- 2B. IN JANUARY 2017 AFTER SERVING PUNITIVE RESTRICTION TIME FOR ASSAULT, THE PLAINTIFF WAS PLACED IN THE MENTAL HEALTH UNIT (MHU) WHERE HE CONTINUED TO BE LOCKED 23 HOURS A DAY WITH ONE HOUR OF YARD MON-FRI. THIS CONTINUED FOR AN EXTENDED PERIOD AS A MEANS OF MANAGING BEHAVIOR.
- 3B. THROUGH THESE MEANS OF BEHAVIOR MANAGING THE PLAINTIFF WAS SUBJECTED TO ESPECIALLY HARSH CONDITIONS OF SOLITARY CONFINEMENT WHICH PLACED AN UNACCEPTABLY HIGH RISK OF HARM TO HIMSELF AS A SERIOUSLY MENTALLY ILL INMATE. THE LACK OF SOCIAL POINTS, SUPPORT, AND SENSORY STIMULATION, INCREASED THE PLAINTIFFS AGGRESSION, AND INCURRED UPON HIM PSYCHOTIC SYMPTOMS NOT FORMERLY EXHIBITED.

- 4B. DURING THE TIME PERIOD OF JANUARY 2017, AND JULY 2018, AND IN RESPONSE TO SOCIAL ISOLATION, AND OTHER DEPRIVATIONS OF SOLITARY CONFINEMENT, CAUSED ACTS OF SELF-HARM, SELF-MUTILATION, ATTEMPTED SUICIDE, PERIODS OF REFUSAL TO EAT, AND INCREASED ACTS OF VIOLENCE.
- 5B. DR. ABBY CASSIDY HAS COMPLETE CHARGE AND CONTROL OF THE MENTAL HEALTH DEPARTMENT, AND DESPITE THE PLAINTIFFS REPEATED CORRESPONDENCE AND VERBAL CONVEYANCE OF HIS DESPAIR AND MENTAL DECLINE, FAILED TO PROVIDE EVEN AN INDIVIDUAL TREATMENT PLAN TO HELP RELIEVE THE PLAINTIFF, THOUGH SHE MEET WITH THE WARDEN ONCE A WEEK TO DISCUSS THE PLAINTIFF AND OTHER INMATES.
- 6B. AT AND DURING THE SPECIFIED TIME PERIOD THE PLAINTIFF ATTEMPTED SUICIDE ONCE, WAS SENT TO TRAUMA ROOM (ER) TWICE TO STITCH VEIN HE SEVERED, WAS STICHED THREE TIMES BY ON SIGHT MEDICAL STAFF, WAS PLACED IN THE RESTRAINT CHAIR IN THE EXCESS OF 15 TIMES FOR SELF HARM WHICH INCLUDES: BANGING HIS HEAD TO CAUSE SERIOUS INJURY, SLICING VEINS TO CAUSE SERIOUS HARM, SELF STRANGULATION, AS WELL AS ACTS OF VIOLENCE SUCH AS THROWING FECES AND BODILY FLUIDS.
- 7B. THOUGH ALL ACTS OF SELF-HARM AND SELF-MUTILATION WERE SYMPTOMS OF THE PLAINTIFF MENTAL ILLNESS, THOSE AND ALL ACTS OF AGGRESSION WERE TREATED WITH IMPOSING DISCIPLINARY SANCTIONS AND DISREGARD TOWARD THE AFFECTS ON THE PLAINTIFFS MENTAL HEALTH.
- 8B. IN JULY 2018 A CIVIL COMMITMENT ~~WAS~~ EVALUATION WAS ORDERED AFTER THE PLAINTIFF SEVERED HIS OWN NIPPLE WITH A STAPLE. THE PLAINTIFF WAS FOUND TO BE SERIOUSLY MENTALLY ILL BY A MENTAL HEALTH JUDGE AND ORDERED TO BE CIVILLY COMMITTED TO A STATE FACILITY.
- 9B. IN FEBRUARY 2019, THE PLAINTIFF WAS SENT TO NORRISTOWN STATE HOSPITAL AS A RESULT OF CIVIL AND CRIMINAL COMMITMENT. IN JULY 2019 HE RETURNED TO B.C.C.F. AND WAS IMMEDIATELY PLACED BACK IN THE M.H.U. ON 23 AND 1 LOCK.



10B. IN A PERIOD TO DATE THREE MONTHS SHY OF FOUR YEARS, THE PLAINTIFF HAS EXPERIENCED JUST FIVE MONTH OF PRIVILEGES IN DIFFERENCE TO 23 AND 1. SINCE JULY 2019, AS AN ADDITIONAL MEANS OF DISCIPLINE THE PLAINTIFF WAS PLACED ON A DIET (FINGER FOOD) WHICH CONSISTS OF POTATGE CHIPS AND PROCESSED MEAT. THE DIET HAS NO REGARD FOR THE PLAINTIFFS PREEXISTING MEDICAL CONDITION. ADDITIONALLY, IMPOSING SANCTIONS CONTINUE TO BE PLACED ON THE PLAINTIFF, HE IS STILL ON THE FINGER FOOD DIET (9 MONTHS TO DATE), HE IS STILL LOCKED 23 AND 1. THE PLAINTIFFS PUNITIVE LOCK DOES NOT EXPIRE UNTILL 2024.

WHEREFORE, IT IS SUGGESTED THAT THE DEFENDANTS FAILED IN ITS OBLIGATION TO PROVIDE A "HEIGHTENED LEVEL OF CARE" FOR AN INMATE WITH SERIOUS MENTAL ILLNESS. IT FAILED TO IDENTIFY RISK OF INCREASED AGGRESSION, SUICIDE, SELF-HARM, AND MENTAL DECLINE. ITS METHODS OF EXTENSIVE ISOLATION PROVOKED NEW AND LASTING PSYCHOSIS, AND ACTED TO USE ISOLATED CONFINEMENT FOR SEVERELY MENTALLY ILL INMATES, ACTS THAT VIOLATE EIGHT AMENDMENT RIGHTS. PLAINTIFF REQUESTS THAT THE EXISTING SYSTEM BE FORCE TO ADJUST TO NECESSARY NEEDS OF MENTALLY ILL INMATES, AND AS WELL REWARD THE AMOUNT OF \$50,000 TO HIM FOR CRUEL PUNISHMENT AND CONSEQUENTIAL MENTAL SUFFERING.

RESPECTFULLY SUBMITTED

Craig Boston prose

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

CRAIG BOSTON, prose

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Dr. ABBY CASSIDY,  
PRIMCARE INC.

MOTION TO PROCEED WITHOUT  
PRE-PAYMENT

I, Craig Boston, prose, am an inmate at B.C.C.F. I HAVE THE AMOUNT OF \$0.00 in my ACCOUNT AND HAVE BEEN INDIGENT FOR 9 MONTHS. THE NEEDED DOCUMENTS TO VERIFY THIS HAVE BEEN REQUESTED AND ARE BEING MET WITH RESISTENCE. I AM REQUESTING, RESPECTFULLY THAT A ORDER BE FORWARDED TO AID IN OBTAINING THEM.

RESPECTFULLY REQUESTED

Craig Boston

PLEASE HELP ME WITH THE PROCESS  
OF GETTING THE U.S. MARSHALLS  
TO SERVE THE DEFENDANTS,  
AND PLEASE HELP ME WITH  
THE MOTION TO PROCEED WITH-  
OUT PRE-PAYMENT.

THANK YOU VERY MUCH

Craig Boston



CRAIG B. 120746  
1730 S. EASTON Rd.  
DOMESTOWN, PA, 18901



OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
PHILADELPHIA, PA 19106-9865

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